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10 UNITED STATES DISTRICT COURT

11 NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION

12 WAYMO LLC,

13 Plaintiff,

14 vs.

15 UBER TECHNOLOGIES, INC.;
16 OTTOMOTTO LLC; OTTO TRUCKING
LLC,

17 Defendants.

CASE NO. 3:17-cv-00939-WHA

**PLAINTIFF WAYMO LLC'S
ADMINISTRATIVE MOTION TO FILE
UNDER SEAL PORTIONS OF ITS
REPLY IN SUPPORT OF MOTION FOR
CONTINUANCE OF TRIAL DATE**

Pursuant to Civil L.R. 7-11 and 79-5, Plaintiff Waymo LLC (“Waymo”) respectfully requests to file under seal information in its Reply in Support of Motion for Continuance of Trial Date, filed concurrently herewith. Specifically, Waymo requests an order granting leave to file under seal the portions of the documents as listed below:

Document	Portions to Be Filed Under Seal	Designating Party
Waymo’s Reply in Support of Motion for Continuance of Trial Date (“Waymo’s Reply”)	Highlighted portions	Defendants (blue); Anthony Levandowski (yellow)
Declaration of David Perlson in Response to Court Order	Highlighted portions	Anthony Levandowski (yellow)
Exhibit 2 to Perlson Declaration	Entire document	Defendants and/or Anthony Levandowski
Exhibit 5 to Perlson Declaration	Entire document	Defendants and/or Anthony Levandowski

I. LEGAL STANDARD

Civil Local Rule 79-5 requires that a party seeking sealing “establish[] that the document, or portions thereof, are privileged, protectable as a trade secret or otherwise entitled to protection under the law” (*i.e.*, is “sealable”). Civil L.R. 79-5(b). The sealing request must also “be narrowly tailored to seek sealing only of sealable material.” *Id.*

II. DEFENDANTS AND/OR ANTHONY LEVANDOWSKI’S AND/OR OTHER THIRD-PARTIES CONFIDENTIAL INFORMATION

Waymo seeks to seal these documents only because Defendants and/or non-party Anthony Levandowski and/or other third-parties have designated the information confidential and/or highly confidential. Declaration of Felipe Corredor (“Corredor Decl.”) ¶ 3. Waymo takes no position on the merits of sealing the designated material, and expects Defendants and/or Mr. Levandowski and/or other third-parties to file one or more declarations in accordance with the Local Rules.

1 **III. CONCLUSION**

2 In compliance with Civil Local Rule 79-5(d), redacted and unredacted versions of the
3 above listed documents accompany this Administrative Motion. For the foregoing reasons,
4 Waymo respectfully requests that the Court grant Waymo's Administrative Motion.

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6 DATED: September 19, 2017

QUINN EMANUEL URQUHART & SULLIVAN,
LLP

7
8 By /s/ Charles K. Verhoeven

Charles K. Verhoeven

9 Attorneys for WAYMO LLC
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